

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

The Human Rights Defense Center and Michelle
Dillon,

Plaintiffs,

v.

U.S. Department of Homeland Security, and
United States Immigration and Customs
Enforcement,

Defendants.

No. 2:18-cv-01141 TSZ

STIPULATION AND JOINT
MOTION REGARDING CASE
STATUS AND SCHEDULE

The parties, by and through their undersigned counsel, hereby stipulate as follows:

1. On April 10, 2019, this Court entered a Minute Order Setting Trial and Related Dates, setting a dispositive motion filing deadline of September 12, 2019, a trial date of December 2, 2019, and other case schedule deadlines noted therein. Dkt. No. 18 (“Order”).

2. Since September 2018 and continuing to date, counsel for Plaintiffs and Defendants have been conferring regularly regarding Defendants’ response to the Freedom of Information Act request at issue in this case. In June 2019, Defendants began a rolling production of records responsive to the request, and have been producing records on a monthly basis. Defendants have represented that to date, they have produced approximately 20 percent of the records they have identified as responsive to the request.

3. The parties do not request the Court’s intervention regarding the production at this time, but Plaintiffs reserve the right to do so, and reserve the right to seek additional relief,

1 including without limitation regarding the proper scope of redactions from the produced
 2 records and the adequacy of Defendants' response. At this time, however, the parties believe
 3 they need additional time to evaluate the status of the FOIA request and what, if any, issues
 4 would be appropriate for the Court's determination on a dispositive motion or at trial.

5 4. For the foregoing reasons and for good cause shown, the parties jointly request
 6 that the Court extend the case deadlines and trial date by six months, as shown in the proposed
 7 Order below. Alternatively, if the Court is not inclined to grant the extension, the parties
 8 request the Court schedule a status and scheduling conference.

9 SO STIPULATED AND AGREED this 5th day of September, 2019.

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 11 Attorneys for Plaintiffs

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ORDER

Based on the parties' stipulation and for good cause shown, the Court hereby sets the following trial and related dates:

BENCH TRIAL DATE: **June 1, 2020** (Length of Trial - 1 day)

Dispositive motions: Filed by March 12, 2020 and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d))

Motions in limine: Filed by April 30, 2020 and noted on the motion calendar no later than the Friday before the Pretrial Conference (see LCR 7(d)(4))

Trial briefs/Agreed PTO: May 15, 2020

**Proposed Findings of Fact/
Conclusions of Law:** May 18, 2020

Pretrial Conference: May 22, 2020 at 1:30 p.m.

So ORDERED this ____ day of September, 2019.

The Honorable Thomas S. Zilly

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED this 5th day of September, 2019

/s/Eric M. Stahl

Eric M. Stahl, WSBA #27619